



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



STEVEN E. CHESTER  
DIRECTOR

November 1, 2007

Ms. Mary Gade, Regional Administrator  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard (R-19J)  
Chicago, Illinois 60604-3590

Dear Ms. Gade:

SUBJECT: Final Report for Michigan's Environmental Council of the States (ECOS)  
Regulatory Innovations Agreement, Alternative Permitting Approach for  
Concentrated Animal Feeding Operations (CAFOs)

Enclosed you will find the Michigan Department of Environmental Quality (MDEQ), Water Bureau's (WB), Final Report for Michigan's ECOS Regulatory Innovations Agreement, Alternative Permitting Approach for CAFOs, otherwise referred to as the CAFO Project. This final report assesses the effectiveness of the accomplishments of the CAFO Project and the Michigan Agriculture Environmental Assurance Program (MAEAP) as an alternative program to the traditional National Pollutant Discharge Elimination System (NPDES) Permit Program for large CAFOs. In addition, the final report provides recommendations for improvement of the MAEAP based on the lessons learned from the CAFO Project. Also enclosed is the document file of the CAFO Project.

The ECOS Regulatory Innovations Agreement will expire December 21, 2007. In lieu of extending the CAFO Project, all large CAFOs are now required to obtain appropriate NPDES CAFO permit coverage, in accordance with our rules. Although our findings do not support the original hypothesis that the MAEAP can provide equal or better environmental protections to that of the NPDES Permit Program, the CAFO Project has provided a good transitional program for Michigan's large CAFOs. We also believe that the MAEAP, particularly with the appropriate program improvements, can serve as a valuable voluntary Pollution Prevention Program, particularly for small and medium CAFOs.

Should you have questions regarding the final report, please do not hesitate to contact Mr. Frank J. Baldwin, Chief, Field Operations Division, WB, at 517-335-4171; Ms. Ronda Wuycheck, Field Operations Division, WB, at 517-241-7832; or you may contact me. We thank you for your support of the CAFO Project over the past five years.

Sincerely,

Richard A. Powers, Chief  
Water Bureau  
517-335-4176

Enclosures

Ms. Mary Gade  
Page 2  
November 1, 2007

cc: Mr. Donald Koivisto, Director, Michigan Department of Agriculture  
Mr. Gordon Wenk, Michigan Department of Agriculture  
Mr. Steven E. Chester, Director, MDEQ  
Mr. Jim Sygo, Deputy Director, MDEQ  
Mr. Frank J. Baldwin, MDEQ  
Ms. Ronda Wuycheck, MDEQ